

REMARKS

In the Office Action dated March 25, 2004, claims 1-16 and 24-37 were rejected under 35 U.S.C. §103(a) as being unpatentable over Padwick et al. ("Using Microsoft Outlook 2000"), hereinafter "Padwick in view of Srivastava et al. (US pat. no. 6,549,922), hereinafter "Srivastava". Additionally, claims 17-23 were rejected under 35 U.S.C. §102(e) as being anticipated by Srivastava.

Claims 4, 8, 12-16, 18-19 and 22-37 have been canceled without prejudice, claims 1-3, 5-7, 9, 11 and 17 are currently amended, and claims 38-42 are newly presented. Thus, claims 1-3, 5-7, 9, 11, 17 and 38-42 are pending. Applicant submits no new matter has been added.

Discussion of Rejections Under 35 U.S.C. § 103(a)

In the subject Office Action, claims 1-16 and 24-37 were rejected under 35 U.S.C. §103(a) as being unpatentable over Padwick in view of Srivastava.

In order to establish a prima facie case of obviousness, the prior art reference, or references, must teach or suggest all the claim limitations. Additionally, there must be some suggestion or motivation, either in the references themselves, in the nature of the problem being solved, or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must be found in the prior art and not based on Applicants' disclosure.

Claim 1, as amended, recites a method comprising:

- during operation of a program, receiving input indicating a category property set from a plurality of category property sets, wherein each of the category property sets defines fields for a selected genre of audio or video content files;

- during the operation of the program, receiving input indicating a first display set that defines a first set of metadata fields associated with the selected genre of audio or video content files;

- during the operation of the program, associating at least a first portion of the fields of the category property set with the first display set;

- during the operation of the program, receiving input indicating a second display set that defines a second set of

metadata fields associated with the selected genre of audio or video content files;

during the operation of the program, receiving input indicating that at least a subset of the first portion of the fields of the category property set are related to the second display set; and

automatically updating metadata fields defined by the first and second display sets to reflect changes made to at least the subset of the first portion of the fields of the category property set. (Emphasis added)

Thus, a category property set defining fields for a selected genre of audio or video content files is defined. Additionally, a first display set is defined to be associated with a portion of the fields defined by the category property set. Further, a second display set is defined to be associated with at least an overlapping portion of the fields defined by the first display set. Thereafter, changes made to the overlapping portion of fields in one display set are automatically reflected in the other display set. Applicants submit that neither Padwick nor Srivastava (alone or in combination) teach or otherwise suggest that changes made to fields defined by one display set are automatically reflected within a second display set. Claim 9 contains similar elements as claim 1.

Claim 11 is directed to a method as follows:

identifying a category property set having a set of data fields associated with a genre of audio or video content files, wherein the category property set is associated with a set of display groupings and a set of metadata fields wherein the metadata fields are related to at least one of the display groupings;

dynamically generating a display structure comprising display grouping structures that are based at least in part upon the set of display groupings;

dynamically populating the display groupings with metadata field structures;

dynamically populating the metadata field structures with the related metadata field data;

receiving input indicating a change to a metadata field structure; and

dynamically propagating the change to additional metadata field structures. (emphasis added)

Thus, as with claims 1, a category property set defining fields for a genre of audio or video content files is defined, wherein the category property set is associated with a set of display groupings and a set of metadata fields related to at least one of the display groupings. Display groupings are populated with metadata field structures,

which in turn are populated with metadata field data. Thereafter, changes received to a metadata field structure are propagated to additional metadata field structures.

Padwick is designed as a reference guide for users of Microsoft Outlook 2000. Padwick teaches how database entries or items such as appointments, contacts, and messages may be organized according to various fields within each item. Although Padwick further teaches that each item may be associated with predefined fields or even user-defined custom fields, Padwick **does not teach or suggest that changes made to a field associated with one item are automatically reflected in other items sharing the same fields**. More specifically, although on page 1108, Padwick teaches steps for “Creating A Simple Custom Field”, the custom field may be created only **for a particular item** such as an appointment, contact, or message and not across all or a set of items (see e.g. step 7 “[t]he new field appears in the list of User-defined Fields *in This Item* - emphasis added). Furthermore, on page 1120, Padwick states that **you cannot change the data type of an Outlook custom field**. To do so, one needs to delete the field and then re-create the field. Thus, applicant submits that at the very least, Padwick does not teach or suggest “automatically updating metadata fields defined by the first and second display sets to reflect changes made to at least the subset of the first portion of the fields of the category property set”. Furthermore, Padwick does not teach or suggest or dynamically propagating changes made to one metadata field structure across additional metadata field structures.

Srivastava is directed to a system for collecting, transforming and managing media metadata. Srivastava describes capturing metadata and transforming the metadata into logical annotations stored in a standard format. Although Srivastava teaches that auxiliary metadata in the form of an attribute and attribute value may be provided by a user, **the attribute/value pair only applies to the current annotation** and not across multiple annotations (see e.g., column 3, lines 33-35; and column 4, lines 14-22). Accordingly, Applicant submits that Srivastava also does not teach or suggest “automatically updating metadata fields defined by the first and second display sets to reflect changes made to at least the subset of the first portion of the fields of the category property set” or dynamically propagating changes made to one metadata field structure across additional metadata field structures. As such, Applicant submits that Srivastava does not cure the deficiencies of Padwick. Thus,

Even if one were to assume *arguendo* that Srivastava teaches one or more claim elements for which Applicant submits Padwick is deficient, Applicant submits that there is no suggestion or motivation, either in the references themselves, in the nature of the problem being solved, or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. The fact that references *can* be modified is not sufficient to establish *prima facie* obviousness.

Padwick is a manual for how to use existing features of Microsoft Outlook 2000. It does not contemplate modifying the program nor does it suggest modifying the actual program to perform tasks that it was not designed to perform. One of ordinary skill in the art generally would not look to a user manual as motivation for modifying the actual program described in the user manual.

Thus, for at least the reasons set forth above, Applicant respectfully requests reconsideration and allowance of Claims 1, 9, and 11. Furthermore, due at least in part to their dependence on claims 1, 9, and 11, Applicant submits that claims 2-3, 5-7 and 10 are similarly allowable. Claims 4, 8, 12-16 and 24-37 have been canceled thereby rendering the rejections to these claims as moot.

Discussion of Rejections Under 35 U.S.C. § 102(e)

Claims 17-23 were rejected under 35 U.S.C. §102(e) as being anticipated by Srivastava. Claim 17 is directed to a metadata editor system for organizing, displaying, and allowing access to metadata from a metadata database on a plurality of platforms. The system comprises:

- a metadata database configured to store category and property information about metadata relating to one or more audio or video content files;

- a graphical user interface display module configured to display subsets of the metadata wherein the subsets of metadata are organized by display groups of metadata fields, and wherein the metadata fields in the display groups are configurable by a user; and

- a metadata update module configured to receive user modifications to a first display group definition representing an addition of at least one additional metadata field to the first display group definition, and to add the at least one additional metadata field to one or more additional metadata display group definitions.

For at least the reasons set forth above, applicants submit that Srivastava does not teach or suggest a metadata update module configured to receive user modifications to a first display group definition representing an addition of at least one additional metadata field to the first display group definition, and to add the at least one additional metadata field to one or more additional metadata display group definitions. Accordingly, Applicant submits that claim 17 is not anticipated by Srivastava. Due at least in part on their dependency to claims 17, Applicant submits that claims 20 and 21 are similarly not anticipated by Srivastava. Claims 18-19 and 22-23 have been canceled thereby rendering the rejections to these claims as moot.

CONCLUSION

In light of the above amendments and remarks, this application is now in condition for allowance. Claims 1-3, 5-7, 9, 11, 17 and 38-42 remain currently pending. The Commissioner is hereby authorized to charge shortages or credit overpayments to Deposit Account No. 500393. A Fee Transmittal is enclosed in duplicate for fee processing purposes.

Respectfully submitted,

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Dated: _____

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